

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L.
Madoff Investment Securities LLC and for the
Estate of Bernard L. Madoff,

Plaintiff,

v.

BAM L.P., MICHAEL MANN, AND MERYL
MANN,

Defendants.

Adv. Pro. No. 08-01789 (SMB)
SIPA LIQUIDATION
(Substantively Consolidated)

Adv. Pro. No. 10-04390 (CGM)

NOTICE OF DEFENDANTS' COUNTER-PROPOSED JUDGMENT

PLEASE TAKE NOTICE that pursuant to the Memorandum Decision Determining Funds Held in the Bank Accounts are Customer Property and Awarding Prejudgment Interest, dated December 11, 2020 [ECF No. 247], and in accordance with Local Bankruptcy Rule 9074-1, Defendants BAM L.P., Michael Mann and Meryl Mann, through their undersigned counsel, are submitting the attached Defendants' Counter-Proposed Judgment, together with the Defendants' Objection to the Trustee's Proposed Judgment and Request to Modify the Judgment

being filed simultaneously herewith, in opposition to the Trustee's Proposed Order Implementing Judgment [ECF No. 249] and attached proposed Judgment [ECF No. 249-1]

Dated: December 21, 2020
New York, New York

DENTONS US LLP

By: /s/Arthur H. Ruegger
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